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April 12, 2021

VIA ELECTRONIC FILING

Hon. Sarah Netburn
United States Magistrate Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN) –
Joint Status Letter regarding Defendant Dr. Abdullah Naseef*

Dear Judge Netburn:

This firm, along with Bernabei & Kabat, PLLC, serves as counsel for Defendant Dr. Abdullah Naseef (“Dr. Naseef”). Together with the Plaintiffs’ Executive Committees (“PECs”) (collectively, “Parties”), we write jointly pursuant to Your Honor’s April 2, 2021 Order (ECF No. 6703) to update the Court regarding the Parties discussions concerning Dr. Naseef.

Pursuant to Your Honor’s directive, the Parties have met and conferred and have agreed to proceed as follows:

1. Counsel for Dr. Naseef will promptly inform the PECs (and the Court, pursuant to ECF No. 6703) should Dr. Naseef’s medical condition change in a way that would affect his participation in this litigation.
2. Barring a change in Dr. Naseef’s medical condition, further proceedings as to Dr. Naseef, including without limitation any discovery schedule, any authorized renewed briefing on the issue of personal jurisdiction, any other dispositive motion with respect to Dr. Naseef, and any evidentiary hearing or trial, will proceed, as they have to date, concurrent with the schedule for the other defendants presently in jurisdictional discovery.

Accordingly, the Parties respectfully request that the Court issue an Order endorsing the Parties’ agreement to proceed as outlined herein. We appreciate and thank the Court for its consideration of this status letter and joint request.

Hon. Sarah Netburn
April 12, 2021
Page 2

Respectfully submitted,



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cc: All Counsel of Record via ECF